

Hon. Brian A. Tsuchida  
United States Magistrate Judge

UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF WASHINGTON  
AT SEATTLE

UNITED STATES OF AMERICA,  
Plaintiff,

v.

HAMEAD IBRAHIM ABDULLAHI,  
Defendant.

CASE NO. MJ17-069

COMPLAINT for VIOLATIONS  
18 U.S.C. § 922(g)(1)

BEFORE the Honorable Brian A. Tsuchida, United States Magistrate Judge,  
Seattle, Washington.

The undersigned complainant, Beau Jacobsen, Special Agent, Bureau of Alcohol  
Tobacco, Firearms, and Explosives, being duly sworn states:

**COUNT ONE**

**(Felon in Possession of a Firearm)**

On or about September 5, 2016, in the City of Seattle, within the Western District  
of Washington, HAMEAD IBRAHIM ABDULLAHI, having been convicted of the  
following crimes punishable by imprisonment for a term exceeding one year, to wit:

- a. *Residential Burglary*, in King County Superior Court, Washington,  
under cause number 14-1-03837-9, dated on or about April 17, 2015;

- b. *Attempting to Elude a Pursuing Police Vehicle*, in King County Superior Court, Washington, under cause number 10-1-10030-6, dated on or about January 6, 2012;
- c. *Felony Harassment - Threat To Kill*, in King County Superior Court – Juvenile Division, Washington, under cause number 07-8-00380-2, dated on or about October 24, 2007; and
- d. *Taking a Motor Vehicle Without Permission in the Second Degree*, in King County Superior Court – Juvenile Division, Washington, under cause number 07-8-02296-3, dated on or about July 13, 2007;
- e. *Taking a Motor Vehicle Without Permission in the Second Degree*, in King County Superior Court – Juvenile Division, Washington, under cause number 07-8-00492-2, dated on or about May 2, 2007; and
- f. *Unlawful Possession of a Firearm in the Second Degree*, in King County Superior Court – Juvenile Division, Washington, under cause number 06-8-04694-5, dated on or about November 29, 2006;

did knowingly possess, in and affecting interstate and foreign commerce, the following firearm, to wit: a Glock Model 22, .40-caliber semi-automatic handgun, with an extended magazine, bearing serial #AANK791, which had been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

## **COUNT TWO**

### **(Felon in Possession of a Firearm)**

On or about September 23, 2016, in the City of Bellevue, within the Western District of Washington, HAMEAD IBRAHIM ABDULLAHI, having been convicted of the above crimes punishable by imprisonment for a term exceeding one year, to wit:

- a. *Residential Burglary*, in King County Superior Court, Washington, under cause number 14-1-03837-9, dated on or about April 17, 2015;
- b. *Attempting to Elude a Pursuing Police Vehicle*, in King County Superior Court, Washington, under cause number 10-1-10030-6, dated on or about January 6, 2012;
- c. *Felony Harassment - Threat To Kill*, in King County Superior Court – Juvenile Division, Washington, under cause number 07-8-00380-2, dated on or about October 24, 2007; and

- d. *Taking a Motor Vehicle Without Permission in the Second Degree*, in King County Superior Court – Juvenile Division, Washington, under cause number 07-8-02296-3, dated on or about July 13, 2007;
- e. *Taking a Motor Vehicle Without Permission in the Second Degree*, in King County Superior Court – Juvenile Division, Washington, under cause number 07-8-00492-2, dated on or about May 2, 2007; and
- f. *Unlawful Possession of a Firearm in the Second Degree*, in King County Superior Court – Juvenile Division, Washington, under cause number 06-8-04694-5, dated on or about November 29, 2006;

did knowingly possess, in and affecting interstate and foreign commerce, the following firearm, to wit: an Allied Armament model NDS-1P 7.62x39mm caliber semi-automatic rifle, bearing serial #NS33879, which has been shipped and transported in interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 922(g)(1).

### **COUNT THREE**

#### **(Felon in Possession of Ammunition)**

On or about December 21, 2016, in the City of Burien, within the Western District of Washington, HAMEAD IBRAHIM ABDULLAHI, having been convicted of the above crimes punishable by imprisonment for a term exceeding one year, to wit:

- a. *Residential Burglary*, in King County Superior Court, Washington, under cause number 14-1-03837-9, dated on or about April 17, 2015;
- b. *Attempting to Elude a Pursuing Police Vehicle*, in King County Superior Court, Washington, under cause number 10-1-10030-6, dated on or about January 6, 2012;
- c. *Felony Harassment - Threat To Kill*, in King County Superior Court – Juvenile Division, Washington, under cause number 07-8-00380-2, dated on or about October 24, 2007; and
- d. *Taking a Motor Vehicle Without Permission in the Second Degree*, in King County Superior Court – Juvenile Division, Washington, under cause number 07-8-02296-3, dated on or about July 13, 2007;
- e. *Taking a Motor Vehicle Without Permission in the Second Degree*, in King County Superior Court – Juvenile Division, Washington, under cause number 07-8-00492-2, dated on or about May 2, 2007; and

1 f. *Unlawful Possession of a Firearm in the Second Degree*, in King  
 2 County Superior Court – Juvenile Division, Washington, under cause  
 3 number 06-8-04694-5, dated on or about November 29, 2006;

4 did knowingly possess, in and affecting interstate and foreign commerce, the following  
 5 ammunition, to wit: 40 rounds of Fiocchi 7.62x39mm caliber ammunition, which had  
 6 been shipped and transported in interstate and foreign commerce.

7 All in violation of Title 18, United States Code, Section 922(g)(1).

8 **The undersigned, Beau Jacobsen, complainant being duly sworn states:**

9 I am a Special Agent (SA) with the United States Department of Justice (DOJ),  
 10 Bureau of Alcohol, Tobacco, Firearms, and Explosives (ATF), and have been so  
 11 employed since March 24, 2014. I am an “investigative or law enforcement officer of the  
 12 United States” within the meaning of Title 18, United States Code, Section 2510(7), that  
 13 is, an officer of the United States who is empowered by law to conduct investigations of,  
 14 and to make arrests for, offenses enumerated in Title 18, United States Code, Section  
 15 2516. I am currently assigned to the Seattle Field Division Headquarters, in Seattle,  
 16 Washington, where your affiant is assigned to the Violent Gang Task Force and Puget  
 17 Sound Regional Crime Gun Task Force. In this capacity, I conduct narcotics and firearm  
 18 investigations, and enforce federal criminal laws relating to the possession and trafficking  
 19 of firearms and narcotics by gang members with extensive criminal histories. Prior to my  
 20 employment with ATF, I was a commissioned police officer in the State of Colorado with  
 21 the Aurora Police Department from 2011-2014 where I served on the Gang Intervention  
 22 Unit, and a commissioned police officer with the Lakewood Police Department from  
 23 2006-2011 where I served Special Enforcement Team/Gang Unit.

24 I received formal training in the Federal Law Enforcement Training Center in  
 25 Glynco, Georgia, Criminal Investigators Training Program, which familiarized me with  
 26 basic narcotic investigations, drug identification and detection, United States narcotics  
 27 laws, financial investigations and money laundering, identification and seizure of drug-  
 28 related assets, organized crime investigations, physical and electronic surveillance, and  
 undercover operations. In addition, I successfully completed a fourteen-week ATF

Complaint: HAMEAD IBRAHIM ABDULLAHI - 4

UNITED STATES ATTORNEY  
 700 STEWART STREET, SUITE  
 5220  
 SEATTLE, WASHINGTON 98101  
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1 Special Agent Basic Training course in Glyncro, Georgia, which included comprehensive,  
 2 formalized instruction in, among other things: firearms identification, firearms  
 3 trafficking, arson and explosives, and tobacco and alcohol diversion. I have also received  
 4 several hours of specialized training in surveillance techniques, narcotic investigations,  
 5 gang investigations, and was a certified crime scene investigator with the Lakewood  
 6 Police Department.

7 This affidavit is made based upon my personal knowledge, training, experience  
 8 and investigation, as well as upon information provided to me and my review of reports  
 9 prepared by other law enforcement personnel. This affidavit is made for the purpose of  
 10 establishing probable cause for this Complaint and thus does not include each and every  
 11 fact known to me or others concerning this investigation.

#### 12 **SUMMARY OF PROBABLE CAUSE**

##### 13 **A. ABDULLAHI'S Possession of a Handgun and Ammunition in a Vehicle on** 14 **September 5, 2016.**

15 On September 5, 2016, at approximately 2:10 p.m., officers with the Seattle Police  
 16 Department (SPD) observed a male, later identified as HAMEAD IBRAHIM  
 17 ABDULLAHI, seated alone in the front seat of a parked white Ford Crown Victoria  
 18 bearing Washington License Plate number 70939G. The vehicle was partially blocking a  
 19 driveway on the west side of the 3600 block of 36th Avenue South in Seattle,  
 20 Washington. Officers saw ABDULLAHI dropping food wrappers out of the driver's  
 21 window onto the ground outside of his vehicle.

22 Officers contacted ABDULLAHI for littering. ABDULLAHI told officers he did  
 23 not have identification on him and verbally identified himself as Ibrahim I. Ahmed with a  
 24 birthdate of September 22, 1992. ABDULLAHI said he did not have a Washington  
 25 driver's license, and he did not know his social security number. He claimed that he had a  
 26 driver's license out of Minnesota, but he did not know the address on that license. A  
 27 records check revealed no record for Ibrahim I. Ahmed (Date of Birth 9/22/1992) out of  
 28 Washington or Minnesota. Officers suspected ABDULLAHI was lying about his identity

1 and so they confronted him about this information. ABDULLAHI refused to give his  
2 real name.

3 Officers explained to ABDULLAHI that he could consent to being fingerprinted  
4 or be arrested for Obstructing a Public Officer since officers could not verify his identity  
5 and suspected he was lying. At approximately 2:17 p.m., ABDULLAHI apologized for  
6 wasting the officer's time and handed them his Washington identification, which showed  
7 his true name was HAMEAD ABDULLAHI. ABDULLAHI explained to the officers  
8 that he had warrants for his arrest that were non-extraditable. A records check revealed  
9 that ABDULLAHI had a warrant out of Lewis County District Court for Driving with  
10 License Suspended in the First Degree, issued on or about July 29, 2016.

11 ABDULLAHI was detained at this time pending verification of the warrant.  
12 Officers advised ABDULLAHI of his Miranda rights, and ABDULLAHI said that he  
13 understood his rights. Officers asked ABDULLAHI for consent to search his vehicle.  
14 ABDULLAHI declined. After confirming the warrant, ABDULLAHI was placed under  
15 arrest for the warrant and for false reporting.

16 A citizen in the 3600 block of 36th Avenue South complained that  
17 ABDULLAHI'S vehicle was blocking the entry and exit to driveways on the block.  
18 Officers observed that the vehicle was partially blocking two residential driveways.  
19 Because of this obstruction, officers decided to impound the vehicle. Officers asked  
20 ABDULLAHI where the vehicle registration was located. ABDULLAHI said he did not  
21 know and that the vehicle was not his.

22 Officer Cook began the vehicle impound by opening the unlocked glove box to  
23 look for the vehicle registration. Upon opening the glove box, Officer Cook immediately  
24 observed a Glock handgun. Officer Cook left the handgun where it was and stopped his  
25 vehicle inventory. The vehicle was impounded to the Seattle Police Department  
26 Evidence Processing Room pending application for a search warrant.

27 ///

28 ///

1           **1.     Recovery of the Glock .40-caliber Semi-Automatic Handgun with**  
 2           **Extended Magazine.**

3           King County Superior Court Judge Douglass A. North issued a search warrant for  
 4 the white Ford Crown Victoria bearing Washington License Plate number 70939G.  
 5 During the execution of the search warrant, the officers seized a Glock Model 22, .40-  
 6 caliber semi-automatic pistol, bearing serial number AANK791, from the glove box. The  
 7 firearm was loaded with 15 rounds of hollow-point .40-caliber ammunition. On the  
 8 passenger seat, the officers also found a center punch frequently used to break windows  
 9 for car prowls.

10          In the trunk of the vehicle, the officers located and seized a Glock .40-caliber  
 11 plastic gun case. The gun case contained a 25-round magazine filled with .40-caliber  
 12 ammunition. Officers also seized a gray Adidas backpack from the trunk. The backpack  
 13 contained: a Visa Debit card with the name of HAMEAD ABDULLAHI on the card,  
 14 vision prescription paperwork in HAMEAD IBRAHIM ABDULLAHI's name, handle  
 15 accessories for a pistol, a pistol cleaning brush, a pistol gun lock, a plastic bag containing  
 16 15 rounds of .40-caliber ammunition, a broken cardboard box containing 73 rounds of  
 17 .45-caliber ammunition, tools, and a Samsung Galaxy cell phone.

18          During the course of this investigation, SA Beau Jacobsen learned that the Glock  
 19 Model 22, .40-caliber semi-automatic pistol, bearing serial number AANK791, had been  
 20 reported stolen on August 24, 2016, through the King County Sheriff's Office.

21           **2.     ABDULLAHI's Criminal History.**

22          A criminal records check confirmed that ABDULLAHI has multiple adult and  
 23 juvenile felony convictions, including:

- 24           a. *Residential Burglary*, in King County Superior Court, Washington,  
 25           under cause number 14-1-03837-9, dated on or about April 17, 2015;
- 26           b. *Attempting to Elude a Pursuing Police Vehicle*, in King County  
 27           Superior Court, Washington, under cause number 10-1-10030-6, dated  
 28           on or about January 6, 2012;

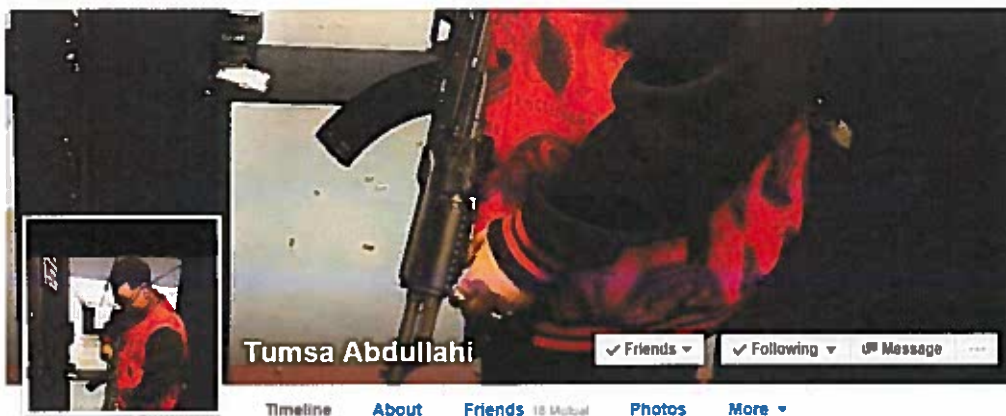


- c. *Felony Harassment - Threat To Kill*, in King County Superior Court – Juvenile Division, Washington, under cause number 07-8-00380-2, dated on or about October 24, 2007; and
- d. *Taking a Motor Vehicle Without Permission in the Second Degree*, in King County Superior Court – Juvenile Division, Washington, under cause number 07-8-02296-3, dated on or about July 13, 2007;
- e. *Taking a Motor Vehicle Without Permission in the Second Degree*, in King County Superior Court – Juvenile Division, Washington, under cause number 07-8-00492-2, dated on or about May 2, 2007; and
- f. *Unlawful Possession of a Firearm in the Second Degree*, in King County Superior Court – Juvenile Division, Washington, under cause number 06-8-04694-5, dated on or about November 29, 2006;

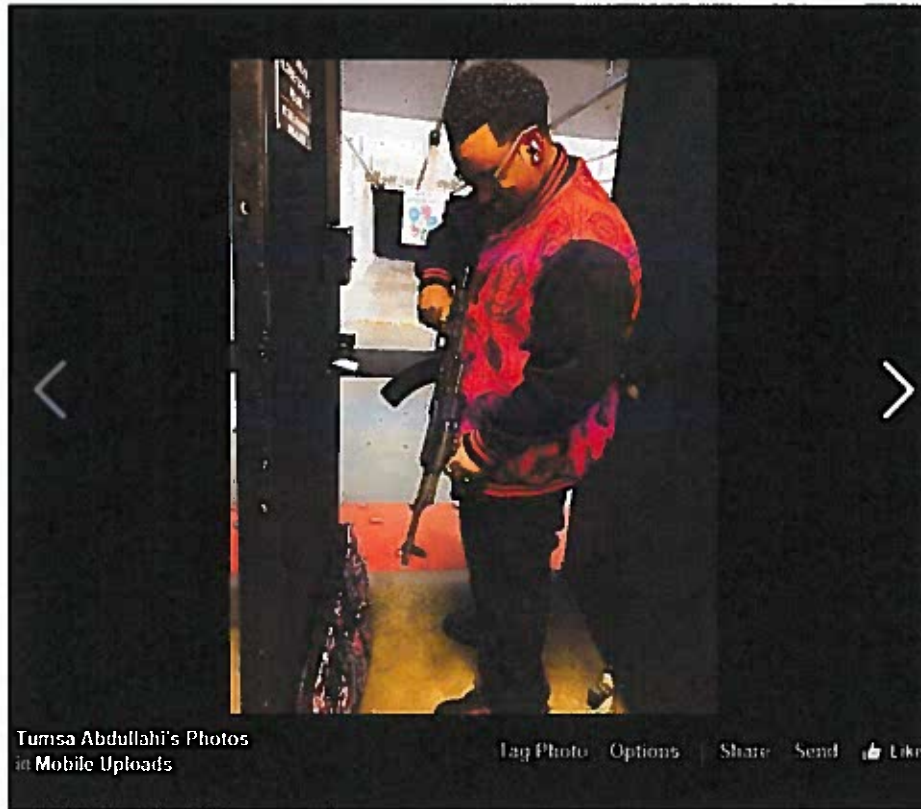
Each of these crimes is a felony under Washington law and is punishable by a term of imprisonment exceeding one year.

**B. ABDULLAHI's Activity at Wade's Gun Range Between August and November 2016.**

On December 12, 2016, ATF SA Beau Jacobsen observed a photograph posted on the Facebook page belonging to "Tumsa Abdullahi." The photograph, reproduced below, depicted a male wearing a red and black jacket holding what appeared to be a black AK-47 style rifle.







Based on the content of the Facebook page and other evidence learned through follow-up investigation, ATF SA Jacobsen believes that the Facebook page belongs to HAMEAD ABDULLAHI and that ABDULLAHI is the man pictured above. ABDULLAHI has posted other photographs on this Facebook page which clearly show his face, including the photograph reproduced on the left, below. The photograph on the right is a Seattle Police Department booking photograph of ABDULLAHI taken on October 5, 2016. The man in the photograph on the left matches the known photograph of ABDULLAHI on the right.



1 After observing the photograph of ABDULLAHI holding the AK-47-style assault  
2 rifle, SA Jacobsen sent the photograph to Task Force Officer (TFO) Wade Jones. TFO  
3 Jones believed that the gun range in the background of the photograph was Wade's  
4 Eastside Guns. Wade's Eastside Guns is located at 13570 Bel-Red Road in Bellevue,  
5 Washington.

6 On December 14, 2016, SA Jacobsen contacted Wade's Eastside Guns Range  
7 Supervisor A.S., who believed he would easily recognize ABDULLAHI. SA Jacobsen  
8 read the Seattle Police Department Montage Identification Sheet Admonition to A.S.  
9 After A.S. stated that he understood, SA Jacobsen showed A.S. a six-person montage that  
10 included ABDULLAHI in position five of the lineup. A.S. immediately identified  
11 ABDULLAHI as the male he had personally dealt with on several occasions at this range.  
12 A.S. stated that ABDULLAHI and another male usually came in together to the range  
13 where they rented firearms and purchased ammunition.

14 A.S. advised that the Wade's Eastside Guns computer system was able to search  
15 for an individual's name and retrieve any receipts related to them. SA Jacobsen asked  
16 A.S. if he would search for ABDULLAHI and ABDULLAHI's companion. A.S.  
17 retrieved the receipts, which showed the following information.

18 **1. Receipts from August 29, 2016.**

19 The receipts from August 29, 2016 showed that, around 1:10 p.m., customer  
20 HAMEAD ABDULLAHI purchased: Two targets, one 12-inch green reactive bullseye,  
21 two sets of ear and eye protection, 50 rounds of Federal RTP 9mm 115-grain FMJ  
22 ammunition, one tactical precision red/black target, one lane rental, and one handgun  
23 rental. This transaction was paid with cash. Additionally, ABDULLAHI's companion,  
24 customer J.H., purchased one guest fee. Like ABDULLAHI, J.H. is a convicted felon and  
25 ineligible to possess firearms or ammunition.

26 At approximately 1:24 p.m., ABDULLAHI also purchased 50 rounds of Fiocchi  
27 .40-caliber Smith & Wesson 170-grain ammunition. Later, at approximately 1:49 p.m.,  
28 ABDULLAHI purchased another 50 rounds of Fiocchi .40-caliber Smith & Wesson 170-

1 grain ammunition, as well as 50 rounds of FNH 5.7x28mm 40-grain HOR VMAX  
2 ammunition. At approximately 2:11 p.m., ABDULLAHI purchased 50 rounds of  
3 Magtech .45-caliber ACP 230-grain FMJ ammunition. Finally, at approximately 2:37  
4 p.m., ABDULLAI purchased an additional 50 rounds of Fiocchi .40-caliber Smith &  
5 Wesson 170-grain ammunition. Each of these purchases was made with cash.

6 **2. Receipts from August 30, 2016.**

7 The receipts from August 30, 2016, showed that customer HAMEAD  
8 ABDULLAHI purchased six targets and one lane rental. This transaction was paid with  
9 cash. Additionally, ABDULLAHI's companion, customer J.C., purchased one guest fee.  
10 J.C. is also a convicted felon and ineligible to possess firearms or ammunition.

11 Based on these receipts, it appears that ABDULLAHI and J.C. likely brought a  
12 firearm and ammunition to the gun range because they did not rent a firearm or purchase  
13 ammunition. It is noteworthy that, on this date, ABDULLAHI visited the gun range after  
14 the Glock Model 22, .40-caliber semi-automatic pistol, bearing serial number AANK791,  
15 had been stolen but before ABDULLAHI was arrested with the firearm on September 5,  
16 2016.

17 **3. Receipts from September 23, 2016.**

18 The receipts from September 23, 2016, less than three weeks after  
19 ABDULLAHI's arrest for Unlawful Possession of a Firearm, showed that, at  
20 approximately 1:44 p.m., customer J.H. purchased: two targets, two sets of ear and eye  
21 protection, four boxes each containing 20 rounds of Fiocchi 7.62x39mm 124-grain FMJ  
22 ammunition, one lane rental, one rifle rental, and one rifle trial. Customer HAMEAD  
23 ABDULLAHI purchased one guest fee. The transaction was paid with cash.

24 Wade's employee A.S. told investigators that Wade's has two assault rifles  
25 available for rental. Based on the stock of the rifle depicted in ABDULLAHI's Facebook  
26 photograph, A.S. was able to confirm that the rifle in the Facebook photograph is an  
27 Allied Armament model NDS-1P 7.62x39mm caliber Semi-Automatic rifle, bearing  
28 serial #NS33879. That rifle is pictured below.



**4. Receipts from November 3, 2016.**

The receipts from November 3, 2016, showed that, around 1:44 p.m., customer HAMEAD ABDULLAHI purchased one target, one set of ear and eye protection, two boxes each containing 50 rounds of Sig Sauer 10mm 180-grain FMJ ammunition, one lane rental, and one handgun rental. This transaction was paid with cash.

**5. Investigators Show Montages to Wade's Employees.**

On December 19, 2016, SA Jacobsen and TFO Jones met at Wade's Eastside Guns to contact the cashiers that handled the transactions with ABDULLAHI. Employee C.B. did not have any independent recollection of the purchases or rentals by looking at the receipts. TFO Jones then asked her to read the Seattle Police Department Montage Identification Sheet Admonition. C.B. stated that she understood. TFO Jones then showed C.B. a six-person montage that included ABDULLAHI in position five of the lineup. C.B. immediately identified ABDULLAHI as a customer she remembered. C.B. described him as a "flashy" dresser and as a customer that usually came in on the weekends.

SA Jacobsen and TFO Jones then contacted employees D.W. and C.Y. separately. Neither D.W. nor C.Y. had any independent recollection of the purchases or rentals by looking at the receipts. TFO Jones asked C.Y. to read the Seattle Police Department Montage Identification Sheet Admonition. C.Y. stated that he understood. TFO Jones then showed C.Y. a six-person montage that included ABDULLAHI in position five of the lineup. C.Y. pointed to position two and position five and said both were possible. After spending additional time looking at the photographs, C.Y. said he was leaning more

1 toward the photograph in position five. TFO Jones asked what percentage of confidence  
2 C.Y. had, and he said 75% on the photograph in position five (ABDULLAHI).

3 SA Jacobsen presented D.W. with the Seattle Police Department Montage  
4 Identification Sheet Admonition. D.W. stated that he understood. SA Jacobsen then  
5 showed D.W. a six-person montage which included ABDULLAHI in position five of the  
6 lineup. D.W. identified ABDULLAHI as a customer he had seen at the range.

7 **C. Arrest of ABDULLAHI on December 21, 2016, and Recovery of Ammunition**  
8 **in ABDULLAHI's Vehicle.**

9 On December 21, 2016, SA Jacobsen and members of the Puget Sound Regional  
10 Crime Gun Task Force (PSRCGTF) organized an operation to arrest ABDULLAHI and  
11 J.H. for their unlawful possession of firearms at Wade's Eastside Guns. This operation  
12 took place at 101 Southwest 119th Street #307 in Burien, Washington, which was a  
13 known location for J.H. and his girlfriend, M.T..

14 At approximately 4:20 p.m., surveillance units watched M.T.'s red Chevrolet  
15 Cruz, bearing Washington license plate AYT7510, arrive at the apartment complex. TFO  
16 Greg Tomlinson saw ABDULLAHI get out of the rear passenger seat of the Cruz and  
17 walk to a nearby red Dodge Charger bearing Washington license plate WSU323D.  
18 ABDULLAHI then returned to the Cruz. Officers approached the vehicle and ordered  
19 the occupants out of the car. ABDULLAHI was arrested from the rear driver-side seat.  
20 The front-seat passenger, identified as J.H., was also arrested. The driver, identified as  
21 M.T., was detained.

22 ABDULLAHI and J.H. were both read their Miranda rights on scene and both  
23 stated that they understood. ABDULLAHI consented to a search of his vehicle, the red  
24 Dodge Charger bearing Washington license plate WSU323D. ABDULLAHI had the  
25 keys to the Charger on his person at the time of his arrest. In the trunk of the Dodge  
26 Charger, SA Brent Price located 40 live rounds of Fiocchi 7.62x39mm ammunition. The  
27 ammunition was the same brand purchased at Wade's Eastside Gun range in  
28



1 ABDULLAHI's name on September 23, 2016, at approximately 1:44 p.m., during the  
2 AK-47 rental.

3 At approximately 4:40 p.m., SA Jacobsen advised M.T. of her Miranda Rights,  
4 which she stated she understood. M.T. immediately told SA Jacobsen that she had a  
5 handgun in her pink bag inside the vehicle. M.T. stated that the pink backpack was on  
6 the driver's seat. M.T. stated she had purchased this handgun along with another handgun  
7 that was currently in her apartment. M.T. stated that the other handgun was located in a  
8 safe inside her apartment. M.T. said that she purchased the guns from a range in  
9 Bellevue a "couple" of months ago.

10 M.T. said that ABDULLAHI drove her to the gun range on the day she purchased  
11 the handguns. J.H. went into the store with her. M.T. admitted that she was still in  
12 possession of two firearms, one in her car and the other in her apartment. M.T. said that  
13 she was the sole person on the apartment lease. M.T. consented to a search of her vehicle  
14 and her apartment. Both firearms were recovered. In M.T.'s vehicle, officers located a  
15 loaded Glock 26 handgun bearing serial #XDD696. The Glock 26 handgun was located  
16 inside M.T.'s pink purse that was sitting on her seat between her and J.H.. In the trunk of  
17 her vehicle, TFO Jones located approximately 113 rounds of ammunition in various  
18 different calibers. M.T. denied that the ammunition was hers and said she knew nothing  
19 about it.

20 ABDULLAHI and J.H. were transported to the Seattle Justice Center and  
21 interviewed about their firearm possession. Prior to this interview, J.H. and  
22 ABDULLAHI were advised of their Miranda Right by SA Jacobsen. These interviews  
23 were audio and video recorded. J.H. and ABDULLAHI were interviewed separately.

24 J.H. admitted that he possessed numerous firearms on multiple occasions. He  
25 admitted that he took a photograph of ABDULLAHI holding the AK-47, using  
26 ABDULLAHI'S cellphone. When TFO Jones asked J.H. about the "All Handgun  
27 Rental" he said that it "sounded like something a baller would do" as he smiled. J.H. said  
28 that he rented "all of them," indicating that he rented all of the handguns that are



1 available to rent at Wade's Eastside Guns. He admitted that he preferred larger caliber  
2 firearms. He admitted that ABDULLAHI was with him when he rented the firearms.  
3 J.H. stated that he associated with J.C., who is about the same age, but explained that they  
4 are no longer friends.

5 ABDULLAHI refused to answer questions about his possession of firearms or  
6 ammunition.

7 **D. Interstate Nexus Examination.**

8 ATF SA Dave Roberts has received specialized training in the recognition and  
9 identification of firearms and ammunition and their place of manufacture. On December  
10 30, 2016, SA Roberts reviewed information on the Glock Model 22, .40-caliber semi-  
11 automatic handgun, bearing serial number AANK791. He determined this is a firearm  
12 within the meaning of 18 U.S.C. § 921(a)(3), and that it was not manufactured in the  
13 State of Washington. As a result, the firearm must have traveled in or affected interstate  
14 or foreign commerce in order to be possessed in the state of Washington.

15 On December 30, 2016, SA Roberts reviewed information on the 40 rounds of  
16 Fiocchi 7.62x39mm caliber ammunition recovered from ABDULLAHI's vehicle on  
17 December 21, 2016. SA Roberts determined that this ammunition was not manufactured  
18 in the state of Washington. As a result, the ammunition must have traveled in or affected  
19 interstate or foreign commerce in order to be possessed in the state of Washington.

20 On January 13, 2017, SA Roberts reviewed information on the Allied Armament  
21 Model NDS-1P, 7.62x39mm caliber semi-automatic rifle, bearing serial number  
22 NS33879. He determined this is a firearm within the meaning of 18 U.S.C. § 921(a)(3),  
23 and that it was not manufactured in the State of Washington. As a result, the firearm  
24 must have traveled in or affected interstate or foreign commerce in order to be possessed  
25 in the state of Washington.


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27 ///

28 ///


**CONCLUSION**

Based on the aforementioned facts, I believe that HAMEAD IBRAHIM ABDULLAHI committed the crime of being a *Felon in Possession of a Firearm* (two counts), in violation of Title 18, United States Code, Section 922(g)(1), and the crime of *Felon in Possession of Ammunition*, also in violation of Title 18, United States Code, Section 922(g)(1).

  
BEAU JACOBSEN, Complainant  
Special Agent, ATF

The above-named agent provided a sworn statement attesting to the truth of the contents of the foregoing affidavit on the 28th day of February, 2017. Based on that statement, the Court hereby finds that there is probable cause to believe the Defendant committed the offenses set forth in the Complaint.

DATED this 28th day of February, 2017.

  
HON. BRIAN A. TSUCHIDA  
United States Magistrate Judge